

The Honorable Marsha J. Pechman

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STRIKE 3 HOLDINGS, LLC, a Delaware
corporation,

Plaintiff,

vs.

JOHN DOE subscriber assigned IP address
73.225.38.130,

Defendant.

Case No.: 2:17-cv-01731-MJP

**DECLARATION OF GREG LANSKY IN
SUPPORT OF PLAINTIFF'S MOTION
FOR LEAVE TO SERVE A THIRD
PARTY SUBPOENA PRIOR TO A RULE
26(f) CONFERENCE**

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DECLARATION OF GREG LANSKY IN
SUPPORT OF PLAINTIFF'S MOTION – (2:17-
cv-01731-MJP)

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**DECLARATION OF GREG LANSKY IN SUPPORT OF
PLAINTIFF'S MOTION FOR LEAVE TO SERVE A THIRD-PARTY
SUBPOENA PRIOR TO A RULE 26(F) CONFERENCE**

I, Greg Lansky, do hereby state and declare as follows:

1. I am a member of General Media Systems, LLC, the parent company that owns Strike 3 Holdings, LLC ("Strike 3"). I am the Chief Creative Officer of the *Blacked*, *Tushy*, and *Vixen* adult brands.

2. I have personal knowledge of all of the matters contained in this declaration and, if called and sworn as a witness, I can and competently will testify to all matters contained herein. This declaration is made in support of Plaintiff's Motion for Leave to Serve a Third-Party Subpoena Prior to a Rule 26(f) Conference.

3. Strike 3 owns the intellectual property to the *Blacked*, *Tushy*, and *Vixen* adult brands, including the copyrights to each of the motion pictures distributed through *Blacked*, *Tushy* and *Vixen* and the trademarks to each of the brand names and logos. Strike 3 is owned entirely by our company General Media Systems, LLC and has existed since 2015.

4. I moved to the United States in 2006 from Paris, France to pursue my dream of creating art in an adult context. I have always been passionate about photography and cinematography.

5. It was a difficult start - I could barely speak English, and I had trouble making connections and finding employment. I struggled for several years to make a name for myself as a reliable photographer and director.

6. Eventually, after tremendous hard work, I was fortunate to be hired by some of the biggest adult brands in the world. Through these experiences, I was able to establish myself and become an expert in the field.

7. In 2013, I decided to risk everything to create my own company and studio. As a director, I felt the industry and I were not offering the best quality and experience possible. I felt I was not offering truly inspiring projects for performers to express their art.

1 8. At the time, the adult market was demoralized and it appeared that a high-quality, well
2 produced, subscription based website would never succeed.

3 9. I can still remember when our company was just three people in my small home office.

4 10. We kept growing and after a few years our brands turned into a multi-million dollar a
5 year business. We now have 20 million unique visitors to our websites per month and a loyal
6 following.

7 11. Our company's philosophies are important.

8 12. We always strive to pay artists and models an amount above that being paid by other
9 companies. Indeed, we are known for paying our performers the highest rates ever recorded.
10 We give them the respect they deserve.

11 13. We focus on delivering to our subscribers and fans superior quality adult films and a
12 wonderful customer experience. People thought we were crazy to think that people wanted to
13 pay for expensive quality adult films and we were told that we were destined to fail. Now, we
14 have a substantial and loyal customer base.

15 14. We provide jobs for nearly 60 people worldwide. We provide good benefits including
16 health care coverage and have an extremely positive company culture.

17 15. Our movies are known for having the highest production budget of any in the industry.
18 We invest in and utilize state of the art cinematic equipment. We film with Hollywood industry
19 standards. And, as our subscriber base grows, we always seek to find ways to invest in value
20 for our customers.

21 16. Because of this, we have a subscriber base that is one of the largest of any adult sites in
22 the world.

23 17. We are also currently the number one seller of adult DVDs in the United States.

24 18. Our content is licensed throughout the world, including by most major cable networks.

25 19. Our success has not gone unnoticed. Indeed, we are very proud to state that our unique
26 cinematic films have won many awards. It's humbling. Some of them include:

- 1 ○ Best marketing campaign – company image (AVN, 2016-2017)
- 2 ○ Best new studio (XBIZ, 2017)
- 3 ○ Best cinematography (AVN, 2016)
- 4 ○ Director of the Year (AVN, 2016-2017; XBIZ, 2017)
- 5 ○ Best membership website (AVN, 2016-2017)
- 6 ○ Adult site of the year – (XBIZ, 2015-2017)

7 20. We also are routinely featured in the mainstream media. Just in the past few months,
8 Forbes,¹ The Daily Beast,² and CBC Radio³ have all done substantial profiles on us.

9 21. We are proud of our impact on the industry. We have raised the bar - leading more adult
10 studios to invest in better content, higher pay for performers, and to treat each performer like an
11 artist. That is a testament to the entire team, the company we have built and the movies we
12 create.

13 22. Unfortunately, piracy is a major threat to our company. We can compete in the industry,
14 but we cannot compete when our content is stolen.

15 23. We have discovered that when we put videos online for paid members to view, it takes
16 as little as four minutes to be downloaded on to torrent websites. We have attempted to identify
17 the initial seeder but have found it impossible with the large volume of our subscriber base.

18 24. We put a tremendous amount of time, effort and creative energy into producing and
19 distributing valuable content for our paid customers. It crushes us to see it being made available
20 to anyone for free in just minutes.

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23 ¹ "How One Pornographer is Trying to Elevate Porn to Art," *Forbes* July 20, 2017
24 <https://www.forbes.com/sites/susannahbreslin/2017/07/20/pornographer-greg-lansky-interview/#2301d3ae6593>

25 ² "Meet the Man Making Porn Great Again," *The Daily Beast*, February 18, 2017
26 <http://www.thedailybeast.com/meet-the-man-making-porn-great-again>

27 ³ "Porn-o-nomics: How one director is making a fortune by defying conventional wisdom," *CBC Radio*,
28 February 24, 2017 <http://www.cbc.ca/radio/day6/episode-326-sanctuary-cities-la-la-land-vs-jazz-hollywood-in-china-porn-o-nomics-and-more-1.3994160/porn-o-nomics-how-one-director-is-making-a-fortune-by-defying-conventional-wisdom-1.3994167>

1 25. We are undeniably the most pirated adult content in the world. Our movies are typically
2 among the most pirated television shows and movies on major torrent websites.

3 26. We send on average 50,000 DMCA notices a month but it does virtually nothing to stop
4 the rampant copyright infringement.

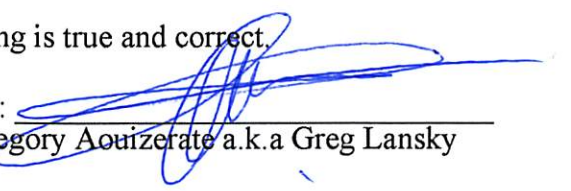
5 27. The only effective way to stop the piracy of our movies on BitTorrent networks is to file
6 lawsuits like this one.

7 28. We believe a consumer's choice of what content to enjoy, whether it be adult
8 entertainment or otherwise, is a personal one to that consumer and therefore it is our policy to
9 keep confidential the identity of not only our subscribers, but even those we are pursuing for
10 copyright infringement.

11 29. To continue to provide value for our members, exciting and inspiring projects for adult
12 performers, and to continue to create jobs and growth in our community, we must protect our
13 copyrights.

14 **DECLARATION**

15 Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury under the laws
16 of the United States of America that the foregoing is true and correct.

17 By: 
18 Gregory Aouizerate a.k.a Greg Lansky
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